

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, *ex rel.*

ANTONI MUHAWI,

Plaintiff,

v.

Case No.: 18-CV-02022
Hon. Manish S. Shah

PANGEA EQUITY PARTNERS,
PANGEA EQUITY PARTNERS, LP,
PANGEA EQUITY PARTNERS II, LP,
PANGEA PROPERTIES,
PANGEA VENTURES, LLC,
PANGEA REAL ESTATE, and
PANGEA REAL ESTATE HOLDINGS, LLC,

Defendants.

JOINT STATUS REPORT

Pursuant to this Court's April 5, 2022 Minute entry (Dkt. 84), counsel for Antoni Muhawi ("Relator") and counsel for Pangea Equity Partners, Pangea Equity Partners, LP, Pangea Equity Partners II, LP, Pangea Properties, Pangea Ventures, LLC, Pangea Real Estate, and Pangea Real Estate Holdings, LLC (together, "Defendants") (collectively, the "Parties") submit this joint status report on discovery progress.

I. STATUS OF DISCOVERY

The Parties served document and deposition subpoenas on the Chicago Housing Authority (“CHA”) in April 2022. CHA responded in mid-May with written responses and objections to each of the Parties’ document subpoenas. The Parties separately discussed with CHA’s counsel the objections to the document subpoenas.

By agreement, CHA was scheduled to produce documents on June 7, 2022. However, on June 6, 2022, CHA contacted the Parties’ counsel and requested an additional twenty-one (21) days (until June 28, 2022) to produce documents. The Parties’ counsel discussed CHA’s request, and they have no objection to it, as long as the current scheduling order is amended to provide sufficient time to conduct CHA’s deposition after the receipt of document production (as addressed in Point II below).

A. Relator’s Subpoenas to CHA

Relator served a document subpoena and two deposition subpoenas—one 30(b)(6) notice and one notice directed to a specific CHA employee. CHA objected to some of Relator’s document requests. Relator’s counsel and CHA’s counsel conferred regarding CHA’s objections. Many of the disputes were resolved as part of the meet-and-confer process. Counsel agreed to revisit certain of CHA’s objections after CHA completed its production, as document production may moot certain disagreements concerning scope.

B. Defendants’ Subpoena to CHA

The Defendants served a document subpoena and reserved issuing deposition subpoenas and 30(b)(6) deposition topics until receipt and review of CHA’s production. CHA objected to some of Defendants’ document requests. Counsel for Defendants and CHA resolved some, but not all, of CHA’s objections during the meet-and-confer process, and Counsel have agreed to revisit

certain of CHA's objections after CHA completes its production, because CHA's production may moot certain disagreements concerning scope.

But Defendants and CHA are unable to resolve at least one CHA objection. CHA has indicated that it will assert a claim of privilege with respect to responsive documents that CHA's Office of the Inspector General ("OIG") may possess that are dated on or after November 24, 2020. Once CHA formally asserts this claim and provides a privilege log, Defendants will promptly file a motion to compel.

II. REQUEST TO EXTEND DEADLINES

Under the Court's Order granting Relator's motion for discovery (Dkt. 84), the Court set certain deadlines: discovery from CHA must be completed by July 11, 2022; Relator's opposition to Defendants' summary judgment motion is due on September 8, 2022; and Defendants' reply is due on September 29, 2022.

As noted above, CHA has requested an extended deadline of June 28, 2022 to complete its document production. To allow the Parties sufficient time to complete discovery and fully brief the summary judgment motion, the Parties request that the Court extend the current deadlines by approximately 45 days. That is, discovery from CHA must be complete by August 31, 2022; Relator will file his opposition to Defendants' summary judgment motion by October 28, 2022; and Defendants will file their reply by November 18, 2022.

Dated: June 8, 2022

HODGSON RUSS LLP

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